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Attorneys for Defendant
APPLE INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ZENTIAN LTD.,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 23-cv-02921-TLT

Hon. Trina L. Thompson

**STIPULATION AND
~~PROPOSED~~ ORDER
MAINTAINING STAY OF CASE**

Plaintiff Zentian Ltd. and Defendant Apple Inc. hereby stipulate and request that the Court maintain the stay in this action as indicated below.

WHEREAS, Apple filed *inter partes* review (“IPR”) petitions at the Patent Trial and Appeal Board (“PTAB”) challenging the patentability of all claims asserted in Zentian’s infringement contentions from U.S. Patent Nos. 7,587,319 (the “’319 Patent”); 7,979,277 (the “’277 Patent”); 10,062,377 (the “’377 Patent”); 10,839,789 (the “’789 Patent”); and 10,971,140 (the “’140 Patent”) (together, the “Asserted Patents”);

WHEREAS, on July 26, 2023, this Court granted the parties’ stipulation to stay this case pending completion of these IPR proceedings (ECF No. 117);

WHEREAS, the Court’s July 26, 2023 order required the parties to file a joint status report within fourteen (14) days of issuance of the final written decisions in the IPR proceedings;

WHEREAS, on June 11, 2024, the PTAB issued its Final Written Decisions in all five proceedings, the results of which are summarized in the table below:

Case No.	Patent	Claims Challenged	Date of Final Written Decision	Claims Found Unpatentable	Asserted Claims Not Found Unpatentable
IPR2023-00033	’319	46-51, 53, 54, 58, 59, 64, 67	06/11/2024	All challenged claims	None
IPR2023-00034	’277	1, 4, 5, 7, 9, 10, 12, 14-16	06/11/2024	All challenged claims	None
IPR2023-00035	’377	1-6 (all)	06/11/2024	All challenged claims	None
IPR2023-00036	’789	1, 2, 4, 6-14, 16-18, 20-29, 35, 37-39, 42-45	06/11/2024	10, 12-14, 16-18, 20-23, 25-28, 35, 37-39, 42-45	1, 2, 4, 6-9, 11, 24, 29
IPR2023-00037	’140	1-8 (all)	06/11/2024	None	1-8

WHEREAS, the parties agree that extending the stay of this action for at least three months would provide time for the parties to attempt to settle this litigation without consuming additional judicial and party resources;

WHEREAS, the parties have not previously requested an extension of the present stay,

nor have they requested any other modification of deadlines set by this Court;

IT IS HEREBY AGREED AND STIPULATED by and between the parties, through their respective counsel, subject to Court approval, THAT:

1. The stay of this case shall remain in effect absent further order from this Court.

All dates and deadlines are stayed as of the filing of this stipulation.

2. The case management conference scheduled for July 25, 2024, and the associated deadline to submit a joint case management conference statement by July 18, 2024, are hereby vacated.

3. If the parties are unable to reach a settlement, the parties shall file a joint status report by September 25, 2024, with the parties' positions on whether the stay should be lifted pending appeals.

Dated: June 25, 2024

/s/ Katherine E. Rhoades

/s/ Roman A. Swoopes

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Attorneys for Plaintiff Zentian Ltd.

Attorneys for Defendant Apple Inc.

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

2 **A Further Case Management Conference is set for 10/3/2024 at 2:00 PM. The stay to be lifted**
3 **at that time.**

4 Dated: June 25, 2024


Honorable Trina L. Thompson
United States District Judge

6 **ECF ATTESTATION**

7
8 I hereby attest that concurrence in the filing of this document has been obtained from each
9 of the other signatories hereto.

10 Dated: June 25, 2024

/s/ Roman A. Swoopes
Roman A. Swoopes